



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND, HAWAII
400 MARSHALL ROAD
PEARL HARBOR, HAWAII 96860-3139

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Ser OPHE1/ 1 4 2 0
17 SEP 2010

CERTIFIED MAIL NO. 7007 3020 0002 3047 7419

Senator Daniel K. Akaka
P.O. Box 50144
Honolulu, HI 96850

Dear Senator Akaka:

SUBJECT: CONTAMINATION OF RESIDENTIAL SITES AT MARINE CORPS BASE
HAWAII, KANEOHE

In response to your letter forwarding Dr. Walter Chun's concerns about chlordane, heptachlor, and heptachlor epoxide of August 10, 2010 at Pa Honua, there is one new issue raised by Dr. Chun regarding the increased risk of exposure associated with the consumption of vegetables or fruits. The Navy in its investigation of the Pa Honua site, and development of the site specific risk assessment only focused on construction activities and land use controls to minimize residential exposure. Pa Honua homes were privatized and conveyed to Ohana Military Communities, LLC (OMC) on 1 October 2006, and is currently under the management of Forest City Residential Management, Inc (FCRMI). During the discussions leading up to privatization, USG disclosed the pesticide-impacted soils issue, and OMC conducted separate environmental due diligence and environmental risk assessments regarding pesticide-impacted soils. Based on the results of the OMC due diligence, FCRMI allows residents to have vegetable garden plots subject to size restrictions. Section 19, Grounds Maintenance, Chlordane and other pesticide applications, of the Resident Handbook addresses resident requirements for gardening, and this document is on the public domain (www.fcmarineshawaii.com).

Regarding Dr. Chun's concerns about chlordane and its breakdown byproducts, the State of Hawaii Department of Health (DOH) received an anonymous complaint in July 2009 regarding the management of pesticide-impacted soils at Pa Honua. The issues raised by the anonymous complaint are nearly identical in nature to the ones raised by Dr. Chun. In response to DOH's request for information, the Navy provided all of the information regarding the site investigation of chlordane-impacted soil, site specific risk assessment, and land use controls.

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In addition, we provided environmental site assessments prepared by Parsons for OMC. OMC's private lenders required the site assessments to be completed by OMC prior to the Navy entering into a contractual agreement with OMC under the Military Housing Privatization Initiative. Based on the information provided, DOH provided confirmation by their letter dated December 14, 2009 that the Navy's investigation and land use control procedures adequately demonstrated that remediation was effective at the Pa Honua site and current conditions are protective of human health and the environment so long as the established pesticide-impacted soil management plan remains in place with appropriate tenant notifications and restrictions on soil exposures.

As we have noted in all of our communication with your office, all actions undertaken and implemented by the Navy are protective of current and future military residents.

Sincerely,

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Copy to:

MCB Hawaii, Kaneohe Bay

Naval Facilities Engineering Command, Pacific

Naval Facilities Engineering Command, Pacific, 09C

Naval Facilities Engineering Command, Pacific, AM5

Ohana Military Communities, LLC